

MINTZ & GOLD LLP
600 Third Avenue, 25th Floor
New York, New York 10016
Telephone: (212) 696-4848
Facsimile: (212) 696-1231
Andrew R. Gottesman, Esq.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
In re

VOYAGER DIGITAL HOLDINGS, INC., *et al.*¹

Chapter 11

Case No. 22-10943 (MEW)

Debtor.

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**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF ALL PAPERS**

PLEASE TAKE NOTICE that, an appearance is hereby entered and request is hereby made by Mintz & Gold, LLP as counsel for Marcum LLP (the “Client”) creditors and parties in interest in the above case, as provided in 11 U.S.C. §1109(b) and the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) 2002, 9007, and 9010(b) that all notices given or required to be given in the above captioned case, and all papers served or required to be served, be given to and served upon:

MINTZ & GOLD LLP
Attn: Andrew R. Gottesman, Esq.
600 Third Avenue, 25th Floor
New York, New York 10016
Telephone: (212) 696-4848
Facsimile: (212) 696-1231
Andrew R. Gottesman, Esq.
E-mail: gottesman@mintzandgold.com

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Code and Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

or demand, statement of affairs, operating reports, schedule of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party-in-interest in this case, with respect to (a) the Debtor (b) property of the Debtor's estate, or proceeds thereof, in which the Debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody or control of others that any of the Debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by any of the Notice Parties.

PLEASE TAKE FURTHER NOTICE that the Clients intend that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (1) the right of each Client to have final orders in non-core matters entered only after de novo review by a United States District Judge; (2) the right of each Client to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) the right of each Client to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Clients are or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, or recoupments the Clients expressly hereby expressly reserves.

Dated: September 21, 2022
New York, New York

MINTZ & GOLD LLP

by: /s/ Andrew R. Gottesman
Andrew R. Gottesman

600 Third Avenue, 25th Floor
New York, New York 10016
Telephone: (212) 696-4848
Facsimile: (212) 696-1231
Andrew R. Gottesman, Esq.
E-mail: gottesman@mintzandgold.com

Attorneys for Marcum LLP